

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

PFIZER INC.,	)	
PFIZER IRELAND PHARMACEUTICALS,	)	
WARNER-LAMBERT COMPANY,	)	
WARNER-LAMBERT COMPANY, LLC	)	
and WARNER-LAMBERT EXPORT LTD.	)	
	)	
Plaintiffs,	)	
	)	
v.	)	C. A. No. 08-164-JJF
	)	
RANBAXY LABORATORIES LIMITED,	)	
RANBAXY PHARMACEUTICALS, INC.	)	
and RANBAXY INC.	)	
	)	
Defendants.	)	

**RANBAXY'S MOTION TO DISMISS PLAINTIFFS' COMPLAINT**

Pursuant to Fed. R. Civ. P. 12(b)(1), and as set forth in its accompanying brief, Defendants Ranbaxy Laboratories Limited, Ranbaxy Pharmaceuticals Inc. and Ranbaxy Inc., (collectively, "Ranbaxy"), move for an Order dismissing Plaintiffs Pfizer Inc., Pfizer Ireland Pharmaceuticals, Warner-Lambert Company, Warner-Lambert Company, LLC and Warner-Lambert Export Ltd.'s Complaint filed on March 24, 2008. This Motion is supported by the accompanying Opening Brief and the Declaration of Jay R. Deshmukh, Esq. Pursuant to Local Rule 7.1.4, oral argument is also hereby requested by Ranbaxy. A form of order is attached hereto.

*Of Counsel*

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DATED: April 24, 2008



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*and Ranbaxy Inc.*


UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on April 24, 2008, I electronically filed the foregoing with the Clerk of Court using CM/ECF and caused the same to be served on the plaintiff at the addresses and in the manner indicated below:

**HAND DELIVERY**

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Plaintiffs,	)	
	)	C. A. No. 08-164-JJF
v.	)	
	)	
RANBAXY LABORATORIES LIMITED,	)	
RANBAXY PHARMACEUTICALS, INC.	)	
and RANBAXY INC.	)	
	)	
Defendants.	)	

**[PROPOSED] ORDER GRANTING DEFENDANTS' REQUEST FOR AN ORDER  
DISMISSING PLAINTIFFS' COMPLAINT**

This \_\_\_\_\_ day of \_\_\_\_\_, 2008, upon consideration of Defendants' Motion to Dismiss Plaintiffs' Complaint, and Plaintiffs' response thereto, this Court finds that it lacks subject matter jurisdiction over Plaintiffs' Complaint.

IT IS HEREBY ORDERED that the Defendants' Motion is GRANTED. Plaintiffs' March 24, 2008 Complaint is dismissed.

\_\_\_\_\_  
United States District Judge